

**DELTA PROTECTION COMMISSION**

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September 11, 1998

To: Delta Protection Commission

From: Margit Aramburu, Executive Director

Subject: Briefing on Concerns of Delta Vector and Mosquito Control Districts Regarding Restoration of Tidal and Managed Wetland Habitats

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The CALFED environmental document states that restoration of large areas to wetland habitat will increase the amount of available mosquito breeding habitat and suggest integrating various mosquito control methods. The March 1998 draft noted that mitigation measures may not be adequate to reduce impacts to less than significant levels (page 8.8-13).

The Delta Protection Commission's comments on the March 1998 draft comments that the environmental document should ensure that any project which could potentially result in increased mosquito breeding habitat be reviewed by the local mosquito and vector control districts and conform to any site specific conditions or best management practices recommended or required by that district. The issue of funding mosquito control district services should be negotiated prior to constructing habitat projects.

The four Districts which address vector control in the Delta are working jointly to ensure that their services will be continued, will be fully funded, and that individual projects will incorporate design elements and management practices to minimize adverse impacts to human health.

Attached is a copy of the comment letter from the four Districts to CALFED. Dave Brown, Manager, Sacramento-Yolo Mosquito and Vector Control District will attend the meeting to answer questions from the Commission.

June 23, 1998

CALFED Bay-Delta Program  
1416 N Street, Suite 1155  
Sacramento, CA 95236-0001

Attention: Rick Breitenbach

SUBJECT: Comments on the Programmatic Environmental Impact  
Statement/Environmental Impact Report, March 1998

Dear Mr. Breitenbach,

I am writing on behalf of the four local mosquito and vector control districts (districts) located in the Delta Region to submit comments on the Programmatic Environmental Impact Statement/Environmental Impact Report (DEIR) for the CALFED program. We are submitting these advisory comments based on the district's local mandate to provide for the CALFED program. We are submitting these advisory comments based on the district's local mandate to provide for the public's health and well being through comprehensive vector control.

The districts primary concerns are based on the proposed development of wetlands as part of the Ecosystem Restoration Program Plan (ERPP). Following are issues that need to be addressed before certification of a final EIS/EIR.

1. Best Management Practices (BMP) for wetland management must be developed and adopted to prevent mosquitoes before creation of wetlands. The districts and the University of California Mosquito Research Program are available to assist in this matter.
2. Acquisition and retirement of privately owned land for ERPP wetland development must not compromise district funding. The activities of vector surveillance and control will intensify with the development of wetlands, necessitating a firm revenue base for current and future district operations.
3. Wetlands developed per the ERPP must be managed with adequate resources in perpetuity. Wetland management and maintenance funds must include adequate monies for ongoing vector surveillance and control for reimbursement to districts for services rendered.
4. The final EIS/EIR should provide adequate mitigation measures to address the unavoidable impacts as described in Section 8.8.2.7, page 8.8-13 of the draft. Again, the districts and the University of California are available to assist in this area.

The districts look forward to working with CALFED staff to develop effective measures to mitigate these issues.

Sincerely,

John R. Stroh  
Manager

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7759 South Airport Way (209) 982-4675  
Stockton, CA 95206-3918

cc:

Contra Costa Mosquito & Vector Control District  
Charles Beealey, Ph.D, Manager (925) 685-9301  
155 Mason Circle, Concord, CA 94520

Sacramento-Yolo Mosquito & Vector Control District  
David Brown, Manager (916) 685-0122  
8631 Bond Road, Elk Grove, CA 95624

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Dennis Beebe, Manager (707) 437-1116  
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